Application No. 10/056,336 Amendment dated July 20, 2005 Reply to Office Action of May 20, 2005

### REMARKS

### Status of Claims

Claims 1-24 were pending in this application. Claims 1, 3, 5-6, 8, 12-15, 18-19, 21 and 23-24 have been amended and new claims 25-30 have been added. Claims 1-30 are presented for examination. Reconsideration of the rejections of all claims and allowance are earnestly solicited in view of the amendments and the following remarks.

## Substance of the Interview

Applicants thank examiner Nguyen for granting the interview on July 12, 2005 and for considering the arguments regarding the deficiencies of the prior art, including Bornstein. The prior art fails to disclose, among other things, arranging images that represents parts of a product according to information stored in product tables, without a user manipulating attributes of the images to create a configured product image.

# Rejections under 35 U.S.C. § 102(b)

Claims 1-24 were rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 6,144,388 to Bornstein (hereinafter Bornstein). This rejection is respectfully traversed.

With respect to independent claims 1 and 19, Bornstein fails to disclose, among other things, "based on said selection of said first component, receiving a selection of a second component images."

Bornstein discloses a system and method for displaying a three-dimensional article on a twodimensional background image of a person. U.S. Patent 6,144,388 (issued Nov. 7, 2000) col. 17, ll. 5-20. The three-dimensional image and the two-dimensional image are independent of each other.  $\overline{Id}$ . at col. 16, ll. 60-65. Bornstein further discloses that a component breakdown scheme is utilize to manipulate the three-dimensional image by creating three dimensional sectors that include component breakdown schemes. Id. at col. 25, ll. 15-30. Accordingly, a user is able to manipulate an object on a two dimensional image while the object retains some attributes specified in a three dimensional model. Id. at col. 10, 11. 45-50, col. 25,40-55; See also, col. 28, 11. 10-45

8

124110v2

Application No. 10/056,336 Amendment dated July 20, 2005 Reply to Office Action of May 20, 2005

Unlike Bornstein, embodiments of the invention provide a method to create a configured image having first and second component images, the second component image being based on the first component image. Here, the first and second component images are related to each other and positioned on a X-Y axis, utilizing stored position data to create the configured image. The first and second component images are arranged to represent the configured image without having to manipulate attributes of each component image to properly configure the image. Therefore, for at least the foregoing reasons the 35 U.S.C. § 102(e) rejection of claims 1 and 19 should be withdrawn.

With respect to independent claim 8, Bornstein fails to disclose, among other things, "consulting a first data table to determine which of a variety of component images comprise said configured product image, . . . and consulting a second data table to determine coordinates on an (X,Y) axis of each selected component that comprise the configured product image."

The Office Action relies on col. 5, ll. 15-65 and col. 18, ll. 1-17, which discloses a method for converting a three dimensional generic article to a two dimensional article and placing the two dimensional article of clothing on a person. The three dimensional object is divided into components utilizing a breakdown scheme. See *Id.* at col. 18, lines 40-50. Each component is converted into a two-dimensional representation and manipulated by an operator to fit a person image.

Unlike Bornstein, the first data table includes images that represent components of a configured product and not sectors of a three-dimensional image. Furthermore because Bornstein does not disclose "components," parts, of a product, Bornstein also fails to suggest or teach the second data table having (X,Y) coordinate data for each component of the product. Therefore, for at least the foregoing reasons the 35 U.S.C. § 102(e) rejection of claim 8 should be withdrawn.

With respect to independent claims 12 and 14, Bornstein fails to disclose, among other things, "determining coordinates on an (X, Y) axis for one or more component images that comprise the product configuration." With respect to independent claim 18, Bornstein fails to disclose, among other things, "a coordinate table, ... specifying positions of component images necessary to correctly make up the configured product." As mentioned above, Bornstein fails to disclose "components" of a product and the coordinates of the components within the configured product, such that, the components are arranged to correctly configure the product without manipulating attributes of the

Application No. 10/056,336 Amendment dated July 20, 2005 Reply to Office Action of May 20, 2005

component images. Therefore, for at least the foregoing reasons the 35 U.S.C. § 102(e) rejection of claim 12, 14 and 18 should be withdrawn.

Claims 2-7, 9-11, 13, 15-17, 18 and 20-24 depend from claims 1, 8, 12, 14, 18 and 19 and are allowable, at least, by virtue of their dependence. New claims 25-30 have been added to further define the claimed invention and are allowable, at least, by virtue of their dependence on claims 1, 8, 12, 14, 18 and 19.

In sum, embodiments of the claimed invention provides product configurations that include individual parts of a product and relationships, i.e., coordinate and overlap relations, between the individual parts of the products. Additionally, embodiments of the claimed invention provide a display of product configuration having individual parts utilizing the product part relationships. Accordingly, claims 1-30 are allowable.

### Conclusion

As set forth above, applicants respectfully submit that all pending claims are in condition for allowance. Applicants respectfully request that this application be allowed and passed to issue. Should, however, any issues remain prior to issuance of this application, the Examiner is urged to contact the undersigned to resolve the same. The Commissioner is hereby authorized to charge any additional amount required, or credit any overpayment, to Deposit Account No. 21-0765.

Respectfully submitted.

Date: July 20, 2005

Monplaisir Hamilton Reg. No. 54,851

SHOOK, HARDY & BACON L.L.P. 2555 Grand Blvd.

Kansas City, MO 64108-2613

816-474-6550